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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION

UNITED STATES OF AMERICA,	:	Case No. 1:18-CR-00057
Plaintiff,	:	SECOND NOTICE OF
v.	:	COMPLIANCE AND
	:	REQUEST FOR RECIPROCAL
RON ROCKWELL HANSEN,	:	DISCOVERY
Defendant.	:	Judge Dee Benson
	:	Magistrate Judge Paul M. Warner

The United States of America, by and through the undersigned, hereby files its second notification of compliance with its discovery obligations in this case and request for reciprocal discovery from the defendant(s).

The United States gives notice that the following is being or has been provided to

counsel for the defendant(s):

Description	Document Bates Ranges:
Supplemental Discovery: One (1) DVD: <ul style="list-style-type: none"> • PDF format • Video: VTS-01 .VOB • .JPEG file • .MSG files 	DVD-001-00001 [Four (4) video files]; DVD-002-00001; DVD-003-00001; FBI302-001-00001 to FBI302-001-00003; FBI302-002-00001 to FBI302-002-00187; FBI302-003-00001; INT-1409-001-00001 to INT-1409-001-00050; INT-A-001-00001 to INT-A-001-00003; INT-C-001-00001; INT-D-001-00001 to INT-D-001-00003; INT-D-002-00001 to INT-D-002-00002; INT-E-001-00001 to INT-E-001-00011; INT-H11DF-001-00001; INT-H11DF-001-00002 [.JPEG image] INT-H11DF-002-00001 to INT-H11DF-002-00020; INT-H-001-00001 to INT-H-001-00005; INT-H-002-00001 to INT-H-002-00012; INT-L-001-00001 to INT-L-001-00005; INT-L-002-00001 to INT-L-002-00006; INT-L-003-00001; INT-NUV-001-00001 to INT-NUV-001-00002; INT-NUV-001-00003 [One (1) Native .MSG File]; INT-NUV-001-00004 [Two (2) Native .Txt files]; INT-NUV-004-00005 [Four (4) Native Excel files]; INT-NUV-001-00006; INT-O-001-00001 to INT-O-001-00002; INT-O-002-00001; INT-S-001-00001 to INT-S-001-00005; INT-V-001-00001 to INT-V-001-00005
Supplemental <ul style="list-style-type: none"> • Hard Copy of Document Index for Second NOC dated: 08-16-2018 	[No Document Control Number] 25 pages

As additional discoverable material becomes available, such material will be provided within a reasonable time. Throughout this case, the United States will provide material discoverable under Rules 16 and 26.2 of the Federal Rules of Criminal Procedure and the Jencks Act without requiring the defendant to make a specific request for such material. Upon the request of the defendant, the United States will permit and facilitate the defendant's own inspection, copying or photographing of those items described/defined in Rule 16(a)(1)(E).

The United States also hereby requests disclosure of evidence by the defendant (also known as reciprocal discovery) pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure and DUCrimR 16-1(c). By providing Rule 16 discovery without requiring a specific request from the defense, the United States invokes a reciprocal obligation on the defendant under DUCrimR 16-1(c), which states that the defendant must allow the government to inspect and to copy the following, as further defined in Rule 16 of the Federal Rules of Criminal Procedure:

- a. Documents and tangible objects the defendant intends to introduce as evidence at trial;
- b. Reports of examinations and tests the defendant intends to introduce at trial or that were prepared by a witness whom the defendant intends to call at trial; and
- c. A written summary of the testimony of any expert the defendant intends to use a trial under Federal Rules of Evidence 702, 703 and 705.

The United States requests that the defendant provide to the government at a reasonable time before trial, copies of the material referenced in this paragraph. Further, the United States requests continuing compliance with the reciprocal discovery following the initial disclosure.

The United States also hereby requests all written and recorded statements by any witness other than the defendant whom the defendant intends to call at trial or a hearing covered by the Jencks Act or Rule 26.2 of the Federal Rules of Criminal Procedure.

DATED this 16th day of August, 2018.

JOHN W. HUBER
United States Attorney

/s/ Robert A. Lund
ROBERT A. LUND
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that on the 16th day of August, 2018, I caused to be sent, via ECF notification and/or first class mail, postage prepaid, a copy of the foregoing SECOND NOTICE OF COMPLIANCE AND REQUEST FOR RECIPROCAL DISCOVERY to the following:

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Attorneys for Defendant Ron Rockwell Hansen

/s/ Glen H. Proctor
Glen H. Proctor
Litigation Support Specialist